



December 14, 2012

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: DA 12-1863, IB Docket No. 12-340; RM-11683

Dear Secretary Dortch:

On behalf of VoX Communications, I am writing in support of LightSquared's recent License Modification Application and its proposal to build a nationwide 4G LTE wireless network and operate it on a wholesale-only basis. VoX Communications sells mobile VoIP services primarily via websites that allow consumers to download a VoIP application directly to a mobile phone or tablet. We operate in New York and Florida and we have app users in more than 160 countries.

As the Commission knows well, our country's mobile wireless infrastructure must be sufficiently robust to not only handle current mobile wireless consumption but also encourage innovations, new goods and services. So long as there is access to sufficient bandwidth, the economic growth opportunities of mobile broadband are simply limitless. The challenge to American competitiveness in the global market is real, and much hinges on the Commission's ability to make spectrum available in a manner that unleashes the waves of innovation associated with additional mobile broadband capacity.

LightSquared's proposal to permanently relinquish terrestrial use of the "upper 10 MHz" and to share 5 MHz of federal spectrum in the wholesale provision of LTE service nationwide will enhance competition significantly by facilitating the ability of new providers to enter local, regional, and nationwide markets and serve customers. For example, LightSquared's planned network would allow VoX to provide a high-quality low-cost bundled service to consumers that includes both data and voice, and all the extra features that we provide consumers in conjunction with voice services, such as voice mail, text messaging, and even video telephony.

More specifically, LightSquared's wholesale-only model will allow wholesale partners to overcome the high barriers to market entry, including potentially prohibitive network deployment and roaming costs, as well as spectrum scarcity, that could otherwise unduly raise operating costs, or preclude us from providing expanded coverage or innovative services altogether. Our VoIP service runs very effectively over satellite broadband, WiFi, 3G and 4G data networks. We are very eager to utilize LightSquared's data network. Our innovative technology fits perfectly on the wholesale-only model and will allow us to bring many new products to market.

Hundreds of millions of American consumers would benefit from the competition, coverage and innovations that would be made possible by LightSquared's network. We are aware of several ways in which American consumers will benefit from products that we plan to offer, and we can only begin to imagine the benefits that consumers will derive from the innovations developed by our competitors. Accordingly, we urge the Commission to grant LightSquared's Application and proposal to deploy a wholesale-only LTE network as quickly as possible.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Paul H. Riss". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul H. Riss  
Chief Executive Officer  
VoX Communications